

# TENNESSEE REGULATORY AUTHORITY

Melvin Malone, Chairman  
Lynn Greer, Director  
Sara Kyle, Director



460 James Robertson Parkway  
Nashville, Tennessee 37243-0505

October 13, 1999

John H. Maxheim  
Chairman of the Board  
Piedmont Natural Gas Company, Inc.  
Post Office Box 33068  
Charlotte, North Carolina 28233

Re: *Application of Piedmont Natural Gas Company, Inc. for Authority to issue and sell 2,000,000 Shares of Common Stock pursuant to the Dividend Reinvestment and Stock Purchase Plan.*

Docket No. ~~99-00692~~

Dear Mr. Maxheim:

The Authority staff has reviewed the above-referenced petition, in which Piedmont Natural Gas Company, Inc. ("Piedmont") seeks Authority approval to issue and sell 2,000,000 shares of common stock pursuant to the Dividend Reinvestment and Stock Purchase Plan (the "Plan"). Based on Tennessee Attorney General Opinion No. 99-119, the Authority staff finds that because Piedmont is a natural gas utility with multistate operations or certificates of authority, operating in Tennessee through its division, Nashville Gas Company, Authority approval of Piedmont's proposed issuance and sale of shares of common stock is not required.

Thank you for informing the Authority of this matter. Please address any other questions to Aster Rutibabalira at (615) 741-2904 ext. 155.

Sincerely,

K. David Waddell  
Executive Secretary

c: Docket No. 99-00692  
Jerry W. Amos ( Amos, Jeffries & Robinson, LLP)  
Richard Collier  
Michael Horne  
Chris Klein  
Edward Phillips  
Aster Rutibabalira

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